

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

DORMAN ANGEL, <u>et al.</u>,	::	CASE NO. C-1-01 467
Plaintiffs	::	JUDGE: BECKWITH
vs.	::	MAGISTRATE JUDGE: BLACK
UNITED PAPERWORKERS	::	
INTERNATIONAL UNION	::	
(PACE) LOCAL 1967, <u>et al.</u>	::	
Defendants	::	
	:: :: :: :: ::	

MOTION OF DEFENDANT PACE
INTERNATIONAL FOR EXTENSION OF TIME

Defendant PACE respectfully requests a ten-day extension of time, to April 14, 2005, for filing its reply memorandum in support of its motion for summary judgment. Counsel for Plaintiffs has agreed to the requested extension, and a memorandum in support is attached.

Respectfully submitted,

s/James B. Robinson

JAMES B. ROBINSON (0023483)

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1014 Vine Street

Cincinnati, Ohio 45202

Phone: (513) 381-3525

Counsel for Defendant PACE International Union

MEMORANDUM IN SUPPORT

_____ Counsel needs the requested extension both because of the death of his uncle in Chicago and associated necessary travel, and because of the complexity of the issues raised in Plaintiffs' answer brief. Counsel for Plaintiffs has agreed to the requested extension, which on the current schedule will not cause any delays in the progress of the case or any inconvenience to the Court or counsel.

Respectfully submitted,

s/James B. Robinson

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CERTIFICATE OF SERVICE

I hereby certify that on the 31st day of March, 2005, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

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I also certify that I have mailed by United States Postal Service the document to the following non-CM/EC. participants:

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